

Case 2:10-cv-10978-PJD-MJH

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FILED

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

2011 JAN -3 A 10:46

AMERICAN UNIVERSITY OF ANTIGUA,
COLLEGE OF MEDICINE, a foreign corporation,

U.S. DIST. COURT CLERK
EAST DIST. MICH
FLINT

Plaintiff,

V

CASE No.: 2:10-cv-10978-PJD-MJH
Judge Patrick J. Duggan

STEVEN WOODWARD,

Defendant,

Motion for Interrogatories

Motion for Interrogatories

The Defendant requests permission from the Court to submit more than 25 written Interrogatories to the Plaintiff.

The Defendant has limited financial means to perform basic Discovery such as depositions.

The Plaintiff has requested and been granted two adjournments.

The Plaintiff's last adjournment of 90 days was for Discovery.

The Honorable Judge Michael Hluchaniuk commented that the Defendant can use this time for Discovery.

During the December 22, 2010 hearing the Defendant brought all of their exhibits, evidence, visual aids, answers to the Plaintiff's Interrogatories and Admissions for the Plaintiff to have or inspect, per the Plaintiff's own request.

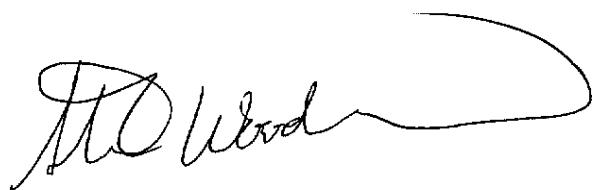
The Defendant acknowledged that they would comply and bring such information.

The Plaintiff refused to cross the courtroom to accept any of the documentation or inspect the Defendant's exhibits, evidence, and/or visual aids of which the Plaintiff requested.

The Plaintiff did not bring to the hearing the answers to the Defendant's Interrogatories or Admissions and none of the requested documentation that was requested by the Defendant.

The Defendant requests approximately half as many Interrogatories as the Plaintiff has an opportunity to ask during a Deposition. At 7 hours and an approximate average of one question per minute would equal approximately 420 questions.

Using this calculation the Defendant requests the Court grant them permission to ask 200 Interrogatories to the Plaintiff.

A handwritten signature in black ink, appearing to read "M. O. Waddell". The signature is fluid and cursive, with a large, sweeping flourish at the end.